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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BARBARA D. RICHARDSON, in her capacity
as Receiver of Nevada Health Co-Op.,

Plaintiff,

v.

UNITED STATES,

Defendants.

Case No.: 2:17-cv-00775-JCM-PAL

**STIPULATION AND PROPOSED
ORDER TO CONTINUE HEARING ON
PROPOSED SCHEDULING ORDER**

**STIPULATION AND PROPOSED ORDER TO CONTINUE HEARING ON
PROPOSED SCHEDULING ORDER**

Plaintiff, Barbara D. Richardson, in her capacity as Receiver of Nevada Health Co-Op (“Richardson” or the “Receiver”) and defendants, U.S. Department of Health and Human Services, et al. (“United States” or “HHS”) (together, the Parties), by and through their respective counsel, hereby stipulate to continue the hearing set for Thursday, December 21, 2017 at 9:00 for 31 days to January 23, 2018 (or a date that is convenient to the Court thereafter) so that the Parties can use the time to attempt to resolve their differences without burdening the Court.¹

¹ In order to attend the 9:00 a.m. hearing on December 21, 2017, counsel for the United States

Pending before the Court is Richardson's Proposed Scheduling Order (Dkt. 30) and the United States' Motion to Reject Plaintiff's Proposed Scheduling Order (Dkt. 31). The Court set Thursday, December 21, 2017 at 9:00 for hearing on this dispute. The Parties are continuing to confer and believe that rescheduling the hearing will facilitate their ability to resolve their differences without burdening the Court.

The Parties respectfully request that the Court continue the hearing to January 23, 2018 or a date thereafter that is convenient for the Court, and that Plaintiffs Response to the United States' Motion to Reject Plaintiff's Proposed Scheduling Order be set at 5 days prior to the hearing date.²

All parties stipulate and consent to the granting of the relief requested herein, and no prejudice will result to any party from the granting of such relief.

DATED this 19 day of December, 2017.

DATED this 19 day of December, 2017.

GREENBERG TRAURIG, LLP

UNITED STATES
DEPARTMENT OF JUSTICE

/s/ Donald L. Prunty

/s/ Frances M. McLaughlin

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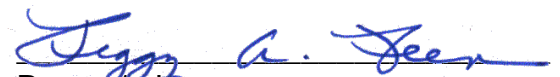
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Counsel for Plaintiff

IT IS ORDERED that the hearing on Plaintiff's Discovery Plan and Scheduling Order (ECF No. 30), and Motion to Deny Plaintiff's Discovery Plan (ECF No. 31) currently scheduled for December 21, 2017 at 9:00 a.m. is **VACATED** and **CONTINUED** to January 23, 2018, at 10:00 a.m.

Dated: December 19, 2017


Peggy A. Leen
United States Magistrate Judge

must travel from Washington, DC on December 20th on an 8:30 a.m. (eastern) flight. If the Court does not grant this Stipulation and Proposed Order prior to that time, then the United States respectfully withdraws from this Stipulation and asks that the December 21, 2017 hearing proceed as scheduled.

² The Parties have conferred about mutually available dates and respectfully advise the Court of their availability for a hearing on January 23, and 24, 2018.